

December 4, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *International Settlements Policy Reform*, IB Docket No. 02-324,
International Settlement Rates, IB Docket No. 96-261
Vodafone Americas, Inc.
Notice of Oral *Ex Parte* Presentation

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), Vodafone Americas, Inc. ("VAI"), by counsel, hereby notifies the Commission that on December 2, 2003, Richard Feasey, Public Policy Director, Vodafone Group Plc, Stephen Parry, Vodafone Group Plc and Carolyn Brandon, counsel for VAI, met with the following individuals to discuss issues raised in the *Notice of Proposed Rulemaking*. In the above-referenced proceeding¹: Lisa Choi, Cara Grayer, Gardner Foster, Jennifer Gorny, Doug Webbink and Mark Uretsky of the International Bureau; Peyton Wynns of the Wireline Competition Bureau; and Joseph Levin of the Wireless Telecommunications Bureau.

Richard Feasey discussed some of the issues VAI addressed in its comments on the *NPRM* relating to foreign mobile termination rates ("MTR"). Mr. Feasey addressed the fact that marginal cost of termination is merely one data point to be considered when analyzing mobile termination rates. Mr. Feasey also explained that on average, MTRs are declining across Europe and the issue of MTRs is being actively debated and considered by foreign regulators including the regulators in the 26 countries in which VOD is operating. Mr. Feasey emphasized that any type of multilateral action by the U.S. government with respect to MTRs is therefore unnecessary and inappropriate.

¹ *International Settlement Policy Reform*, IB Docket No. 02-324, *International Settlement Rates*, IB Docket No. 96-261, *Notice of Proposed Rulemaking*, FCC 02-285 (rel. October 11, 2002) ("*NPRM*").

WILKINSON) BARKER) KNAUER) LLP

Marlene H. Dortch

December 4, 2003

Page 2

Please contact the undersigned if there are any questions concerning this filing.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By: / s / Carolyn W. Brandon

cc: (all via e-mail)
Lisa Choi
Cara Grayer
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Joseph Levin
Mark Uretsky
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